


**U.S. ENVIRONMENTAL PROTECTION AGENCY  
NEW ENGLAND REGION  
J.F.K. Federal Building; Boston, MA 02203-2211**

**MEMORANDUM**

**DATE:** January 29, 1998

**SUBJ:** National Remedy Review Board Recommendations on the Fletcher Paint Superfund Site

**FROM:** Harley F. Laing, Director   
Office of Site Remediation and Restoration

**TO:** Bruce K. Means, Chair  
National Remedy Review Board

**Purpose**

This memorandum is intended to serve two purposes: a Regional response to the National Remedy Review Board (NRRB) Recommendations for the Fletcher's Paint Works and Storage Facility Superfund Site in Milford, New Hampshire, dated December 5, 1996, and a site update, given the time that has elapsed since the NRRB review..

**Review of NRRB Advisory Recommendations**

The Board met on November 21, 1996 with representatives of EPA - New England, and the New Hampshire Department of Environmental Services to review and discuss information submitted previously on the proposed remedial action for the Fletcher's Paint Site. The Board also reviewed information submitted by the main PRP for the site, the General Electric Company, as well as from the Town of Milford, New Hampshire. Based on this review, the Board supported the Region's preferred source control strategy, which combines treatment of highly contaminated soils using thermal desorption and long-term containment of residual soils, and the groundwater restoration strategy of natural attenuation.

The Board expressed concern about the implementability and short-term risks associated with GE's proposed use of the in-situ thermal well technology. The Board supported continuing development of the technology but suggested pilot testing at a site away from local residences to minimize the potential risks.

The Board also observed that there is uncertainty associated with the selection of natural attenuation in bedrock aquifers and suggested the Region clarify the expected time frame for groundwater restoration in future decision documents for this site.

## **Region Response**

We wish to thank the Board for their arduous review of the proposed remedial actions for the Fletcher's Paint Site. It was very clear that each Board member was well versed in the details of the Site and the proposed actions. The Board members combined experiences, ideas and questions, prompted a very long and detailed review of the proposed action for this site. The Boards review was very helpful to the Region, by further assessing the completeness and appropriateness of the proposed cleanup plan with respect to controlling remedy costs and promoting nationally consistent and cost-effective decisions.

The Region released a Proposed Plan in December 1996 and then granted a three month comment period. Following this, the Region then granted an additional 3 month grace period for the submittal of cost, performance and demonstration data on the thermal well technology, at the request of General Electric and the Town of Milford. Review of this technology continues for possible use at the site.

General Electric has proposed a study of the bedrock aquifer as part of the design phase, with a focus on the possible issue of DNAPL and its potential impact on the proposed remedial action. This information should help clarify the estimated time frame for restoration of the bedrock aquifer.

Having granted additional time for comment and data gathering, we expect to release a Record of Decision for this Site in June of 1998.

Again the Region wishes to thank you for your review and support of the proposed remedial action for the Fletcher's Paint Superfund Site.

**Memorandum****To: Harley F. Laing****From: Cheryl L. Sprague, RPM Fletcher's Paint Site**

The dates in this letter are correct. The Board supported the Regions Proposed Plan and therefore in December of 1996 we released the Proposed Plan to the public. We have granted GE additional time comment and data submittal. They actually did not give us data until October 1997. In addition, in a letter from the JDV to GE, we asked GE to submit a focused feasibility study on alternatives using the thermal wells. This was received in December 1997. Upon completing this review we will be able to move forward with a June ROD.

This response is just being sent now as we were unaware that we were required to respond, since the Board fully supported our actions. We were asked to submit a response a few weeks ago by the Board.